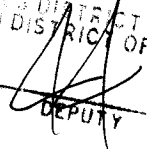


IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

JUDGE FRANK MONTALVO  
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WESTERN DISTRICT COURT  
OF TEXAS  
BY  DEPUTY

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DOLORES BRIONES,  
Defendant.

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SEALED

INFORMATION

Case No. EP-11-CR-2962

**Count One:** Title 18 U.S.C. §§ 371 and 666 -  
Conspiracy to Commit Theft or Embezzlement  
of Federal Program Funds  
**Notice of Forfeiture** - Title 18 U.S.C.  
§§ 371 and 666].

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

(Title 18 U.S.C. §§ 371 and 666(a)(1)(B))

Beginning on or about June 16, 2005, and continuing through and including on or about  
December 31, 2006, in the Western District of Texas and elsewhere, the defendant,

**DOLORES BRIONES,**

knowingly and willfully conspire and agree together and with other persons both known and  
unknown to accept and agree to accept for her benefit, a thing of value involving \$5,000 or more  
intending to be influenced and rewarded in connection with any business, transaction and series of  
transactions of the County of El Paso, Texas, a government entity that received in a one year period  
benefits in excess of \$10,000.00 under a Federal program involving a grant, contract, guarantee and  
other form of federal assistance awarded through the Substance Abuse and Mental Health Services  
Administration, (SAMHSA), a federal agency of the Department of Health and Human Services,

(DHHS), in violation of Title 18 United States Code Sections 371 and 666(a)(1)(B).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

[18 U. S. C. §981(a)(1)(C) and 28 U.S.C. § 2461]

1. Upon the conviction of the offense set forth in Count One of the Information, Conspiracy to Commit Theft and Bribery Concerning Programs Receiving Federal Funds, the defendant, **DOLORES BRIONES** shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, a sum of United States currency representing the amount of proceeds obtained as a result of the offense, for which the defendant is jointly and severally liable, but not limited to the following:

- a. a \$ 36,000.00 Money Judgment for proceeds in an amount of money or other value generated by the criminal scheme excluding the amounts actually seized, if any.

**SUBSTITUTE ASSETS**

2. If any of the property described above in Paragraph 1 of the Notice of Government's Demand For Forfeiture, as being subject to forfeiture pursuant to Title 18 U.S. C. §§ 371 and 666 and Title 28 U.S.C. § 2461 as a result of any act or omission of the defendant, **DOLORES BRIONES**,

- a. cannot be located upon the exercise of due diligence;
- b. have been transferred or sold to, or deposited with, a third person;
- c. have been placed beyond the jurisdiction of the court;
- d. have been substantially diminished in value; or
- e. have been commingled with other property which cannot be subdivided without difficulty;

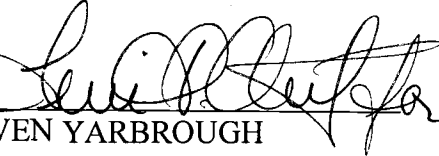
it is the intent of the United States of America, pursuant to Title 18 U. S. C. §§ 371 and 666, Title 21 U.S.C. § 853(p), and Title 28 U.S.C. § 2461 to seek forfeiture of any other property of the said defendant, **DOLORES BRIONES**, up to the value of said property listed in Paragraph 1 above as

being subject to forfeiture.

Respectfully submitted,

ERIC HOLDER  
UNITED STATES ATTORNEY GENERAL

KENNETH GONZALES  
UNITED STATES ATTORNEY  
DISTRICT OF NEW MEXICO

BY:   
STEVEN YARBROUGH

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